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Attorneys for Plaintiff Donovan Sebastian and other similarly situated

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

DONOVAN SEBASTIAN,
individually, on a representative basis,
and on behalf of all others similarly
situated,

Plaintiff,

vs.

SPRINT/UNITED MANAGEMENT
COMPANY, a Kansas Corporation, and
DOES 1 through 20, inclusive,

Defendants.

Case No.: 8:18-cv-00757-JLS-KES
(Assigned to the Hon. Josephine L.
Staton)

FRCP RULE 23 CLASS ACTION

**PLAINTIFF'S NOTICE OF
MOTION AND MOTION FOR
FINAL APPROVAL OF CLASS
ACTION SETTLEMENT**

Hearing

Date: September 6, 2019
Time: 10:30 a.m.
Courtroom: 10A

Complaint filed: March 26, 2018

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on September 6, 2019, at 10:30 a.m., or as soon thereafter as the matter may be heard in the above-entitled Court located in Courtroom 10A at 411 W. Fourth Street, Santa Ana, CA, 92701, Plaintiff Donovan Sebastian will move, pursuant to FRCP Rule 23, for an order granting final approval of the class action settlement between Plaintiff and Defendant Sprint/United Management Company

1 (“Sprint” or “Defendant”). This Motion, which is supported and unopposed by
2 Defendant, seeks final approval of a \$3,250,000 settlement on behalf of the Class
3 Members, including allocations of: (1) attorneys’ fees of \$812,500 (25 percent of the
4 Gross Settlement Amount); (2) litigation costs of \$8,952.56; (3) administrator costs of
5 \$7,500; (4) PAGA payment to the LWDA of \$75,000; and (5) a service award to Plaintiff
6 and class representative Donovan Sebastian in the amount of \$10,000. A proposed order
7 to this effect is filed concurrently herewith.

8 Specifically, Plaintiff requests that the Court grant final approval of the settlement,
9 as preliminarily approved by the Court, and enter the proposed order and final judgment.

10 Good cause exists to grant this Motion because the settlement is fair and
11 reasonable pursuant to the criteria established to evaluate such motions.

12 This Motion is based upon this Notice, the Memorandum of Points and
13 Authorities, the Joint Stipulation of Class Action Settlement and Release (DE 31-3 and as
14 amended by DE 40), Plaintiff’s Motion for Attorneys’ Fees, Costs, and Service Award
15 (DE 42), along with supporting declarations of Brian J. Mankin, Esq. (DE 42-1), Peter J.
16 Carlson, Esq. (DE 42-7), Plaintiff Donovan Sebastian (DE 42-8), the Settlement
17 Administrator (Simpluris) (DE 42-9), class members Lauren Kucma, Gerardo Martinez,
18 and Tonya Priest (DE 42-10 through 42-12), the proposed Order submitted herewith, the
19 pleadings and records on file with this Court, and on such oral and documentary evidence
20 as may be presented at the time of hearing.

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22 Dated: July 26, 2019

FERNANDEZ & LAUBY LLP

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24 BY: /s/ Brian J. Mankin, Esq.
25 Brian J. Mankin, Esq.
26 Attorneys for Plaintiff and the similarly
27 situated employees
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